

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>IN RE:</b>	:	
<b>Richard Harding</b>	:	<b>Chapter 13</b>
	:	<b>Case No.: 19-11995-AMC</b>
<b>Debtor(s)</b>	:	

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtor, Richard Harding, by and through his undersigned counsel, hereby moves to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about March 29, 2019.
2. This Chapter 13 filing was assigned case number 19-11995-AMC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on October 4, 2019.
4. Debtor has paid \$27,023 to the Chapter 13 Trustee to date.
5. On October 11, 2022, Creditor Regional Acceptance Corporation, who serviced the debtor's secured loan for a 2017 Dodge Ram, filed a Motion for Relief from the Automatic Stay. This Motion was granted by this Honorable Court on November 5, 2019, and the Dodge Ram was repossessed.
6. On January 19, 2023, Regional Acceptance Corporation entered a Stipulation of Settlement allowing the debtor to adjust pre-petition arrears into a Modified Chapter 13 Plan.
7. The Stipulation adjusts Claim 5-2 as follows: \$12,326.23 will satisfy the arrears (\$6,163.12, or fifty percent (50%) of claim to be paid through the modified plan; the other fifty percent (50%) shall be paid outside the plan within 30 days of the Amended Claim No, 5 being filed. An Amended Proof of Claim No. 5 (5-3) was filed on 1/26/2023 by Regional Acceptance Corporation.

8. The Modified Chapter 13 Plan (attached hereto as “Exhibit A”) will provide for plan payments in the amount of \$1,314.00 per month for 13 months for a new base amount of \$44,114.00.
9. The debtor is aware he must remain current on any/all ongoing post-petition payments owed to Regional Acceptance Corporation to avoid any future attempts to modify the Stipulation.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan in consideration of the Stipulation of Settlement of Regional Acceptance Corporation.

Dated: February 14, 2023

/s/Brad J. Sadek, Esq  
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